

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

DECLARATION OF ROBERT S. BERMAN

I, Robert S. Berman, make the following declaration pursuant to 28 U.S.C. 1746:

1. I currently serve as a Deputy Chief in the Voting Section in the Department of Justice's Civil Rights Division. My duties have included supervisory authority over the review of voting changes submitted to the Attorney General under Section 5 of the Voting Rights Act, 42 U.S.C. 1973c. I have been employed as an attorney in the Civil Rights Division for over 35 years, with 23 years of service in the Voting Section.
2. I have personal knowledge of the information contained in this declaration based upon my review of relevant records maintained by the Department of Justice, as well as my professional experience with, and personal knowledge of, Departmental policies and procedures.
3. The formula set forth in Section 4 of the Act, 42 U.S.C. 1973b, determined whether a jurisdiction, either a state or a political subdivision within a state, had to comply with Section 5 of the Act before implementing any change affecting voting. Since 1965, the Attorney General

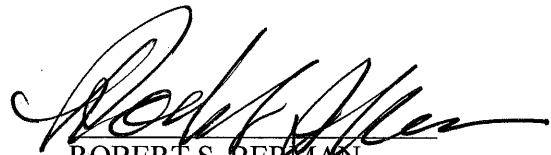
received thousands of requests for the administrative review of voting changes from these covered jurisdictions.

4. All or parts of the States of Alabama, Alaska, Arizona, California, Florida, Georgia, Louisiana, Michigan, Mississippi, New Hampshire, New York, North Carolina, South Carolina, South Dakota, and Texas, and the Commonwealth of Virginia were subject to the requirements of Section 5 during part of 2013, prior to the June 25, 2013, decision in *Shelby County v. Holder*, 133 S. Ct. 2612 (2013).

5. From 2004 through 2013, the jurisdictions identified in paragraph 4 made 2,165 submissions of voting changes to the Attorney General.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of July 2014.



ROBERT S. BERMAN
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